

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

RESONANT SYSTEMS, INC., d/b/a
RevelHMI,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 7:25-cv-00035

JURY TRIAL DEMANDED

COMPLAINT FOR INFRINGEMENT OF U.S. PATENT 8,860,337

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Resonant Systems, Inc., doing business as RevelHMI (“Plaintiff” or “RevelHMI”) makes the following allegations against Defendant Meta Platforms, Inc. (“Defendant” or “Meta”):

INTRODUCTION

1. This complaint arises from Meta’s unlawful infringement of United States Patent 8,860,337 (the “337 Patent” or “Asserted Patent”), owned by Plaintiff, which relates to improvements in haptic feedback devices.

PARTIES

2. Plaintiff is a corporation organized and existing under the laws of the state of Washington, with a place of business at 520 South King Street, Seattle, Washington 98104. Plaintiff is the sole owner by assignment of all right, title, and interest in the Asserted Patent, including the right to recover damages for past, present, and future infringement.

3. Defendant Meta Platforms, Inc. is a publicly traded corporation organized under the laws of the State of Delaware, with a place of business at 607 W 3rd St., Austin, TX 78701.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Meta in this action because Meta has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Meta would not offend traditional notions of fair play and substantial justice. Meta, directly and through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, importing, offering to sell, and selling products that infringe the Asserted Patent, and inducing others to do the same.

6. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Defendant has committed acts of infringement in this District and has regular and established places of business in this District, including its office located at 607 W 3rd St., Austin, TX 78701.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 8,860,337

7. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

8. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 8,860,337, entitled “Linear vibration modules and linear-resonant vibration modules.” The ’337 Patent was duly and

legally issued by the United States Patent and Trademark Office on October 14, 2014. A true and correct copy of the '337 Patent is attached as Exhibit 1.

9. Meta makes, uses, offers for sale, sells, and/or imports certain products, including without limitation the Meta Quest 3 (collectively "Accused Products"), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the '337 Patent.

10. The Accused Products satisfy all claim limitations of one or more claims of the '337 Patent. A claim chart comparing exemplary independent claim 2 of the '337 Patent to representative Accused Products is attached as Exhibit 2.

11. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Meta has injured Plaintiff and is liable for infringement of the '337 Patent pursuant to 35 U.S.C. § 271.

12. As a result of Meta's infringement of the '337 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Meta's infringement, but in no event less than a reasonable royalty for the use made of the invention by Meta, together with interest and costs as fixed by the Court.

PRAAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Meta has infringed, either literally and/or under the doctrine of equivalents, the '337 Patent;
- b. A judgment and order requiring Meta to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Meta's infringement of the '337 Patent;
- c. A judgment and order requiring Meta to pay Plaintiff compulsory ongoing licensing fees, as determined by the Court;

- d. A judgment and order requiring Meta to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest and compensation for infringing products released after the filing of this case that are not colorably different from the Accused Products;
- e. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Meta; and
- f. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: January 31, 2025

Respectfully submitted,

/s/ Reza Mirzaie _____

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